

EXHIBIT B



CT Corporation
Service of Process Notification
04/05/2023
CT Log Number 543564226

Service of Process Transmittal Summary

TO: Mojgan Zare
Georgia Harm Reduction Coalition, Inc.
1231 JOSEPH E BOONE BLVD NW
ATLANTA, GA 30314-2395

RE: Process Served in Georgia

FOR: Atlanta Harm Reduction Coalition, Inc. (Domestic State: GA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: Angela M Gonzalez-hassan // To: Atlanta Harm Reduction Coalition, Inc.

CASE #: 23A017603

NATURE OF ACTION: Employee Litigation - Discrimination

PROCESS SERVED ON: C T Corporation System, Lawrenceville, GA

DATE/METHOD OF SERVICE: By Process Server on 04/05/2023 at 11:13

JURISDICTION SERVED: Georgia

ACTION ITEMS: SOP Papers with Transmittal, via UPS Next Day Air , 1ZX212780104671011

REGISTERED AGENT CONTACT: C T Corporation System
289 S. Culver St.
Lawrenceville, GA 30046
877-467-3525
SmallBusinessTeam@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



PROCESS SERVER DELIVERY DETAILS

Date:

Wed, Apr 5, 2023

Server Name:

Drop Service

Entity Served	Atlanta Harm Reduction Coalition Inc
Case Number	23a017603
Jurisdiction	GA

Inserts		



Civil Action No. 23-A-01760-3

Date Filed _____

Magistrate Court ☐
Superior Court ☒
State Court ☐

Georgia, Gwinnett County

Angela M. Gonzalez Hassan

Attorney's Address

Angela M. Gonzalez Hassan
2620 N Berkeley Lake Rd. NW
Ap 418

Name and Address of party to be served.

Atlanta Home Production Coalition Inc.CT Corporation System789 S. Culver St. Lawrenceville, GA 30046(Georgia Home Production Coalition, Inc)
GHPC

Plaintiff

VS.

Atlanta Home Production Coalition

Defendant

Garnishee

Sheriff's Entry Of Service

Personal <input type="checkbox"/>	I have this day served the defendant _____ personally with a copy of the within action and summons.
Notorious <input type="checkbox"/>	I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County. Delivered same into hands of _____ described as follows age, about _____ years; weight, about _____ pounds; height, about _____ feet and _____ inches; domiciled at the residence of defendant.
Corporation <input checked="" type="checkbox"/>	Served the defendant _____ a corporation by leaving a copy of the within action and summons with _____ in charge of the office and place of doing business of said Corporation in this County.
Tack & Mail <input type="checkbox"/>	I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.
Non Est <input type="checkbox"/>	Diligent search made and defendant _____ not to be found in the jurisdiction of this Court.

This _____ day of _____, 20____.

Deputy

Sheriff Docket _____ Page _____

Gwinnett County, Georgia

WHITE: Clerk

CANARY: Plaintiff / Attorney

PINK: Defendant

IN THE SUPERIOR COURT OF GWINNETT COUNTY

STATE OF GEORGIA

Angela M Gonzalezhassan

Plaintiff

VS.

Atlanta Harm Reduction Coalition Inc.

Defendant

**Civil Action
Number 23-A-01760-3**

FILED IN OFFICE
CLERK SUPERIOR COURT
GWINNETT COUNTY, GA
2023 MAR -7 AM 10:51
TIANA P. GARNER, CLERK

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Angela M Gonzalezhassan
Apt 418
2620 N Berkeley Lake Rd Nw
Duluth Ga 30096**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 7th day of March, 2023

**Tiana P. Garner,
Clerk of Superior Court.**

By: 
Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.

SC-1 Rev. 2011

E-FILED IN OFFICE -
CLERK OF SUPERIOR COURT
GWINNETT COUNTY, GEORGIA
23-A-01760
3/6/2023 4:42 PM
TIANA P. GARNER, CLERK

IN THE SUPERIOR COURT OF GWINNETT COUNTY,
STATE OF GEORGIA

ANGELA M. GONZALEZ-HASSAN,
Plaintiff

CIVIL ACTION
NO. 23-A-01760-3

v.

ATLANTA HARM REDUCTION COALITION, INC.
Defendant

COMPLAINT FOR DISCRIMINATION BASED ON RACE

COMES NOW, Plaintiff, Angela M. Gonzalez-Hassan, appearing pro se, and brings this action under Title VII of the Civil Rights Act of 1964 and Title I of the Civil Rights Act of 1991, to correct unlawful employment practices on the basis of race discrimination and retaliation, and to provide appropriate relief to Angela Gonzalez-Hassan. As alleged with greater particularity in paragraphs 1-9 against Defendant, Atlanta Harm Reduction Coalition, INC., as follows:

1.

Plaintiff is a resident of Gwinnett County and has been a resident of the State of Georgia for 4 years prior to the date of filing this Complaint.

2.

Defendant is located in Fulton County, GA. It is anticipated that defendant will acknowledge service of this Complaint at the location of the organization, 1231 Joseph E. Boone Blvd., Atlanta, GA 30314. In the event that service is not acknowledged, Defendant may be served at the last known address of their

registered agent, CT Corporation System at 289 S. Culver St, Lawrenceville, GA 30046 or wherever else the registered agent may be found.

3.

This Court has jurisdiction over this matter pursuant to O.C.G.A. § 9-10-31. Venue is proper in Gwinnett County, Georgia, pursuant to O.C.G.A. § 9-10-92.

4.

Plaintiff's first day working for Defendant was on June 27, 2022, hired as the Satellite Director of a forthcoming satellite office, located in Stone Mountain, GA.

5.

She was told that she would be under the supervision of her peers: Jasmine Benton (Program Director), Christen Sampurmathy (Operations Director), and Mahlet Solomon (Development Director), as her supervisor, Dr. Mogjen Zare, was out of the country.

6.

On July 13, 2022, during a program meeting, Jasmine made discriminatory comments regarding mixed-race individuals, stating that they are not qualified to speak for Black people, and she specifically mentioned that she could tell that a mixed-race woman was mixed with Puerto Rican. As a mixed-race individual herself, Plaintiff was offended by these comments, but was afraid to report them to her supervisor as she had not had a one-on-one meeting with her yet, and she was not sure how it would affect her employment.

7.

Despite the painful experience, Plaintiff continued to perform her duties to the best of her ability and build relationships with her colleagues. At a conference from August 25-27th, Plaintiff experienced being ostracized by her colleagues, who avoided making eye contact with her, excluded her from conversations, and ignored her presence. Dr. Zare did not meet with Plaintiff as promised after the conference and only agreed to meet with her via Google Meet on September 6, 2022.

8.

During the meeting, Plaintiff expressed her concerns about how her colleagues treated her at the conference, and Dr. Zare promised an investigation and a follow-up meeting with all the directors. Minutes after the meeting ended, Plaintiff was told to come down to the main office for her 45-day review, which was almost a month past her 45-day mark. During this meeting, Plaintiff received a poor performance evaluation and was told that her 90-day probation period would be extended an additional 90 days, based mostly on behaviors that Dr. Zare claimed were observed at the conference before Plaintiff's complaint was investigated.

9.

Plaintiff continued to perform her duties despite these discriminatory actions; but on October 19, 2022, when office furniture was being moved into the Stone Mountain location, her colleagues Jasmine and Christen engaged in bullying behavior towards each other during a marketing meeting, and Dr. Zare laughed it off, even though Plaintiff had just experienced ostracism from them.

COUNT I - DISCRIMINATION BASED ON RACE

Plaintiff incorporates paragraphs 1-9 as if fully set forth herein.

Defendant discriminated against Plaintiff based on her race in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e et seq., and Georgia Fair Employment Practices Act, O.C.G.A. § 34-1-2.

THEREFORE, I respectfully pray that this honorable court grant me the following relief:

- A. An award of back pay, including all benefits, in an amount to be proven at trial;
- B. An award of compensatory damages, including but not limited to the cost of healthcare, for the emotional distress, sleeplessness, loss of enjoyment of life and mental anguish, reputational harm, and strained relationships with family and friends caused by the discriminatory conduct;
- C. An award of punitive damages in an amount to be proven at trial, to punish Defendant for its intentional and malicious conduct;
- D. An award of 100% of my current and future legal fees and costs associated with this civil action;
- E. Any other relief the Court deems just and proper.

I hereby affirm that the foregoing statements are true and correct to the best of my knowledge and belief.

DATED: March 6, 2023

Respectfully submitted,

Angela M. Gonzalez-Hassan

Angela M. Gonzalez-Hassan

Tel: (470) 282-7774

Address: 2620 N. Berkeley Lake Rd NW
Apt 418
Duluth, GA 30096

Email: angee.gonzalez@yahoo.com



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Atlanta District Office
100 Alabama Street, SW, Suite 4R30
Atlanta, GA 30303
1-800-669-4000
Website: www.eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161 & 161-A)

Issued On: 12/05/2022

To: Ms. Angela M. Gonzalez-Hassan
2620 N. Berkeley Lake Rd. Apt 418
DULUTH, GA 30096
Charge No: 410-2023-01348

EEOC Representative and email: Larry Satterwhite
Senior Federal Investigator
larry.satterwhite@eeoc.gov

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice. Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 410-2023-01348.

On behalf of the Commission,

Digitally Signed By: Darrell Graham
12/05/2022

Darrell Graham
District Director

Cc:

Please retain this notice for your records.

EEOC Form 5 (11/99)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: EEOC Agency(ies) Charge No(s): 410-2023-01348					
		and EEOC					
State or local Agency, if any							
Name (Indicate Mr., Ms., Mrs.) Ms. Angela M. Gonzalez-Hassan		Home Phone 470-282-7774	Year of Birth 1				
Street Address 2620 N. Berkeley Lake Rd. Apt 418 DULUTH, GA 30096							
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others: (If more than two, list under PARTICULARS below.)							
Name Atlanta Harm Reduction Coalition, Inc		No. Employees, Members 15 - 100 Employees	Phone No.				
Street Address 1231 JOSEPH E BOONE BLVD NW ATLANTA, GA 30314							
Name		No. Employees, Members	Phone No.				
Street Address		City, State and ZIP Code					
DISCRIMINATION BASED ON National Origin, Race		DATE(S) DISCRIMINATION TOOK PLACE <table border="0"> <tr> <td>Earliest</td> <td>Latest</td> </tr> <tr> <td>08/29/2022</td> <td>10/26/2022</td> </tr> </table>		Earliest	Latest	08/29/2022	10/26/2022
Earliest	Latest						
08/29/2022	10/26/2022						
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I was hired by the above-named employer around June 27, 2022, as a Satellite Director. Around August 29, 2022, I complained to Human Resources about my Supervisor, Jasmine Benton making unwelcome comments towards me along with bullying me along with my peers bullying me. On October 26, 2022, I was discharged by CEO, Mujghan Zare. The reason given for my discharge was poor performance and violation of code of conduct policy. I believe that I have been discriminated against based on my race (African-American) and my national-origin (Puerto-Rican), in violation of Title VII of the Civil Rights Act of 1964, as amended and in retaliation of (Title VII)							
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements					
I declare under penalty of perjury that the above is true and correct. Digitally Signed By: Ms. Angela M. Gonzalez-Hassan 11/29/2022		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)					
Charging Party Signature							

3/6/23, 11:49 AM

Yahoo Mail - New Request 410-2023-006128

New Request 410-2023-006128From: eeoc.foia@arkcase.comTo: angee.gonzalez@yahoo.com

Date: Monday, March 6, 2023 at 11:48 AM EST

**U.S. Equal Employment Opportunity Commission**

Dear Angela Gonzalez-Hassan,

Your request has been delivered to the U.S. Equal Employment Opportunity Commission. The request has been assigned tracking # 410-2023-006128, please log into your account and review your submission.

The application address is <https://eeoc.arkcase.com/foia/portal/login>

Thank you,

U.S. Equal Employment Opportunity Commission

Notice of Confidentiality: The information contained in this transmission may contain privileged and confidential information, including information protected by federal and state privacy laws. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited and may be unlawful. If you are not the intended recipient, please contact us at foia@eeoc.gov and destroy all copies of the original message and attachments.

Request Details

Title	410-2023-006128 - Request for file, will be filing lawsuit		
Type	New Request	Queue	Intake
Created	03/06/2023 16:47 (UTC)	Received	03/06/2023 16:47 (UTC)
Assignee		Owning Group	AO_FOIA_LOGGER_INTAKE_ATLANTA-410@EEOC.ARKCASE.COM
Due	04/03/2023 21:30(UTC)	Priority	Normal

E-FILED IN OFFICE -
CLERK OF SUPERIOR COURT
GWINNETT COUNTY, GEORGIA
23-A-01760
3/6/2023 4:42 PM
TIANA P. GARNER, CLERK

General Civil and Domestic Relations Case Filing Information Form

☒ Superior or ☐ State Court of Gwinnett Superior Court County

For Clerk Use Only

Date Filed _____
MM-DD-YYYY

Case Number 23-A-01760-3

Plaintiff(s)

Gonzalez-Hassan, Angela M

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Defendant(s)

Atlanta Harm Reduction Coalition, INC

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney _____ State Bar Number _____ Self-Represented ☒

Check one case type and one sub-type in the same box (if a sub-type applies):

General Civil Cases

- ☐ Automobile Tort
☐ Civil Appeal
☐ Contempt/Modification/Other Post-Judgment
☐ Contract
☐ Garnishment
☐ General Tort
☐ Habeas Corpus
☐ Injunction/Mandamus/Other Writ
☐ Landlord/Tenant
☐ Medical Malpractice Tort
☐ Product Liability Tort
☐ Real Property
☐ Restraining Petition
☒ Other General Civil

Domestic Relations Cases

- ☐ Adoption
☐ Contempt
☐ Non-payment of child support, medical support, or alimony
☐ Dissolution/Divorce/Separate Maintenance/Alimony
☐ Family Violence Petition
☐ Modification
☐ Custody/Parenting Time/Visitation
☐ Paternity/Legitimation
☐ Support - IV-D
☐ Support - Private (non-IV-D)
☐ Other Domestic Relations

☐ Check if the action is related to another action pending or previously pending in this court involving some or all of the same: parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number _____

Case Number _____

☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in OCGA § 9-11-7.1.

☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required _____

☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

E-FILED IN OFFICE -
CLERK OF SUPERIOR COURT
GWINNETT COUNTY, GEORGIA
23-A-01760
4/3/2023 1:58 PM
TIANA P. GARNER, CLERK

IN THE SUPERIOR COURT OF GWINNETT COUNTY,
STATE OF GEORGIA

ANGELA M. GONZALEZ-HASSAN
Plaintiff

Civil Action No. 23-A-01760-3

ATLANTA HARM REDUCTION COALITION, INC.
Defendant

AMENDMENT TO ORIGINAL COMPLAINT

COMES NOW, Plaintiff, ANGELA M. GONZALEZ-HASSAN, appearing pro se, and amends the original complaint in the above-captioned matter as follows:

1. The Plaintiff hereby amends the original complaint to allege that she was subjected to harassment, ostracization, exclusion, and covert bullying by her colleagues.
2. The Plaintiff alleges that the harassment and bullying were severe and pervasive and created a hostile work environment.
3. The Plaintiff alleges that the Defendant was aware of the harassment and bullying but failed to take appropriate action to stop it.
4. The Plaintiff alleges that the harassment and bullying ultimately led to her wrongful termination.
5. The Plaintiff seeks all appropriate legal remedies available under Georgia and Federal law for the harassment, retaliation, and wrongful termination that she has suffered.

WHEREFORE, the Plaintiff prays for judgment against the Defendant for all damages recoverable under Georgia and Federal law, as well as all costs and attorney's fees.

DATED: April 3, 2023

Respectfully submitted,

Angela M. Gonzalez-Hassan

Angela M. Gonzalez-Hassan
2620 N. Berkeley Lake Rd NW
Apt 418 Duluth, GA 30096
(470) 282-7774
amore.gonzalez@yahoo.com